

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AHMED ELZEIN,

Plaintiff,

v.

ASCENSION GENESYS HOSPITAL,  
Defendant.

Case No. 22-12352

Hon. Sean F. Cox

Magistrate Judge Curtis Ivy, Jr.

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**DEFENDANT'S  
PRELIMINARY TRIAL WITNESS LIST**

Defendant Ascension Genesys Hospital (“AGH” or “Defendant”), through its undersigned counsel, hereby submits the following Preliminary Trial Witness List of individuals who may testify at trial of this matter:

1. Ahmed Elzein, c/o Plaintiff’s counsel.
2. Natalia Baj-Osiewicz, MD, c/o counsel for Defendant.

3. Bradley R. Caloia, DO, c/o counsel for Defendant.
4. Marney Daugherty, c/o counsel for Defendant.
5. Andrew Dolehanty, DO, c/o counsel for Defendant.
6. Tammy Gauthier, c/o counsel for Defendant.
7. Kathleen Scott (Hadden), c/o counsel for Defendant.
8. Helena Kurowski, c/o counsel for Defendant.
9. Rachel Marble, RN, c/o counsel for Defendant.
10. Barbara Pawlaczyk, MD, c/o counsel for Defendant.
11. Andrew Vosburgh, MD, c/o counsel for Defendant.
12. HimaBindu Yarlagadda, MD, c/o counsel for Defendant.
13. Malcolm S. Cohen, Ph.D. (economic expert, or his equivalent), Employment Research Corporation, 305 E. Eisenhower Pkwy., Suite 316, Ann Arbor, MI 48108.
14. Elissa P. Benedek, M.D., FacPsych, Psychologist (psychological expert, or her equivalent), 3607 Chatham Way, Ann Arbor, MI 48105.
15. Custodians of Records for Defendant.
16. Custodians of Records from the Michigan Unemployment Insurance Agency, Department of Energy, Labor & Economic Growth, Cadillac Place, 3024 W. Grand Blvd., Detroit, MI 48202.
17. Custodians of Records for the Department of Licensing and Regulatory Affairs, P.O. Box 30478, Lansing, MI 48909.
18. Custodians of Records for the Equal Employment Opportunity Commission (“EEOC”), 477 Michigan Ave., Room 865, Detroit, MI 48226.

19. Custodians of Records for the Michigan Department of Civil Rights (“MDCR”), 3054 West Grand Boulevard, Suite 3-600 Detroit, MI 48202.
20. Representatives and Custodians of Records for Havenwyck Hospital, 1525 University Dr, Auburn Hills, MI 48326.
21. Custodians of Records for any past, present and prospective employers of Plaintiff.
22. Custodians of records for Plaintiff’s current and past treating physicians and medical providers that are relevant to Plaintiff’s liability and damages claims, c/o of their respective entities.
23. Custodians of records for Plaintiff’s educational entities, c/o of their respective entities.
24. All persons, not objected to by Defendant, identified in all pleadings, interrogatory answers and depositions.
25. All persons, not objected to by Defendant, identified in those documents produced during discovery.
26. Any persons, not objected to by Defendant, who was deposed in this action.
27. All persons identified by Plaintiff and not objected to by Defendant, whether called or not.
28. All other necessary rebuttal witnesses, including lay and experts, as necessary.

Defendant reserves the right to amend its Witness List and to add additional witnesses as they become known through the course of discovery.

Respectfully submitted,

JACKSON LEWIS P.C.

By: /s/ Daniel C. Waslawski

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Dated: May 30, 2023

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing instrument was served upon all parties/attorneys in the above cause at their respective addresses disclosed on the pleadings on May 30, 2023 by:

<input type="checkbox"/> Hand Delivery	<input type="checkbox"/> U. S. Mail
<input type="checkbox"/> Overnight Delivery	<input type="checkbox"/> FAX
<input checked="" type="checkbox"/> ECF (E-filing)	<input type="checkbox"/> E-mail

/s/ Daniel C. Waslawski